

Gregory A. Ross
LAW OFFICE OF GREGORY A. ROSS, P.C.
4245 Kemp Blvd., Suite 308
Wichita Falls, Texas 76308
Phone: (940) 692-7800
Fax : (940) 692-7813
State Bar No. 17302500
Attorney for Movant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE:

KENNETH WAYNE HAYNIE AND
BRENDA LOUISE HAYNIE
Debtors.

Case No. 09-70540-13
(Chapter 13)

UNION SQUARE FEDERAL CREDIT
UNION,

Movant,

VS.

KENNETH WAYNE HAYNIE AND
BRENDA LOUISE HAYNIE,

Respondents.

(A CONTESTED MATTER)

**UNION SQUARE FEDERAL CREDIT UNION'S OBJECTION TO
TRUSTEE'S RECOMMENDATION CONCERNING CLAIMS, OBJECTION TO
CLAIMS, AND PLAN MODIFICATION**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES Union Square Federal Credit Union, Creditor in the above cause, through its counsel of record and objects to the proposed Trustee's Recommendation Concerning Claims,

Objection to Claims and Plan Modification (the "TRCC") and in support thereof would show as follows:

1. The TRCC provides that Claim #17 will not be paid through the Plan as the property is surrendered. The collateral in question is a 2003 Pride RV and 2000 Ford 350. Only the 2003 Pride RV is being surrendered. The 2000 Ford 350 isn't. Therefore, there is collateral that the Debtors are keeping and should not be shown as surrendered.
2. With regard to the 2003 PrideRV though it has been shown as being surrendered, Debtors have not cooperated in surrendering that vehicle to the Credit Union. The Credit Union is therefore taking steps to recover that vehicle without the Debtors cooperation. It is expected that there will be a deficiency claim on the RV and that deficiency claim is secured by the 2000 Ford 350 that the Debtors are retaining.

WHEREFORE, Union Square Federal Credit Union requests that this matter be set for a hearing, and that upon such hearing the Court enter its Order denying Trustee's Recommendation Concerning Claims, Objection to Claims, and Plan Modification. Union Square requests such other relief that may be just and proper.

Respectfully submitted,
/s/ Gregory A. Ross
Gregory A. Ross
State Bar No. 17302500
Attorney for Movant

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was June 9, 2010, duly served on all parties of interest:

Debtors' Attorney
Trustee

/s/ Gregory A. Ross
Gregory A. Ross